

Exhibit B

From: [Tom Lepri](#)
To: [Beck, Deanna \(Minasi\)](#); [Gaioni, Mark](#); [Jones, Robert](#); [Simkin, Alexander](#)
Cc: [Jeremy Andersen](#); [Vinay Basti](#); [Timothy Nagle](#); [Aaron Zigler](#)
Subject: RE: State Street Bank data production
Date: Monday, November 25, 2024 10:25:53 PM

THIS MESSAGE IS FROM AN EXTERNAL SENDER

This message came from a sender outside of Ropes & Gray

Looking into this, Deanna.

From: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>
Sent: Monday, November 25, 2024 10:24 PM
To: Tom Lepri <thomaslepri@quinnemanuel.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: RE: State Street Bank data production

[EXTERNAL EMAIL from deanna.minasi@ropesgray.com]

Tom,

Our vendor has attempted to commence the transfer, pursuant to my below email. However, when attempting to access the S3 bucket that you provided on Thursday (), they received an error message stating that the bucket does not exist. This error was not present last week, when our vendor tested the bucket and was able to successfully set up a DataSync location. Can you please confirm that Plaintiffs have not removed or otherwise changed the bucket in any way? If Plaintiffs have removed or changed the bucket, please provide corrected ARN information as soon as possible, so we can effectuate the transfer without further delay.

Thanks,
Deanna

Deanna E. Beck (Minasi)
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From: Beck, Deanna (Minasi)
Sent: Monday, November 25, 2024 7:39 PM
To: 'Tom Lepri' <thomaslepri@quinnemanuel.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <robert.jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: RE: State Street Bank data production

Tom,

Now that Plaintiffs have provided the relevant AWS information to effectuate the data transfer, we are commencing the transfer of the trading data and the source code for the Currenex matching engine. We expect this process may take a couple of days and we will let you know when we believe the transfer is complete. Please note that our inventory analysis and QC process remain ongoing and it is therefore possible that Currenex and/or State Street may need to make supplemental and/or corrective production(s). If that ends up being the case, we will let you know.

Despite the much larger relative size of our data production, we still have not yet received the bucket or ARN information necessary to effectuate XTX's data transfer. We reiterate our request for this information, and ask that Plaintiffs please provide an update as to when Defendants can expect to receive XTX's data production.

Thanks,
Deanna

From: Tom Lepri <thomaslepri@quinnemanuel.com>
Sent: Thursday, November 21, 2024 11:13 AM
To: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: RE: State Street Bank data production

Deanna –

For part 1 of the process you described below, namely . . .

Currenex Data Transfer to Plaintiffs

- Currenex's role ARN is as follows:

- [REDACTED]

- As noted in the below email, we will require a bucket in [REDACTED] and the bucket's ARN from Plaintiffs. Please provide this information as soon as it becomes available.

... here is the information you requested: [REDACTED]

We're working on the second part.

From: Tom Lepri <thomaslepri@quinnemanuel.com>
Sent: Thursday, November 21, 2024 9:06 AM
To: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: Re: State Street Bank data production

Thanks, and yes, Deanna, we're working on that. This question was related to that effort. I'll get this back to our IT people. If there is still any confusion, it may make sense to get the IT folks on the phone together with an attorney from each side.

From: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>
Sent: Thursday, November 21, 2024 9:04:02 AM
To: Tom Lepri <thomaslepri@quinnemanuel.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: RE: State Street Bank data production

[EXTERNAL EMAIL from deanna.minasi@ropesgray.com]

Tom,

We may need further clarification from your IT person as to what is meant by "configured with S3 Endpoints," but we can tell you the following about the AWS infrastructure that we are using, and our IT team's understanding of Plaintiffs' proposed transfer method (AWS DataSync between S3 bucket), which we hope will be sufficient to address your question.

1. S3 endpoints enable private network connectivity between external-to-AWS infrastructure or VPC resources and S3 buckets. We can confirm that all S3 buckets that our side is using in this matter are private and our networking infrastructure is configured to access them via private and secure endpoints.

2. Our IT team does not understand the use of S3 endpoints to be relevant to maintaining privacy and security of an AWS DataSync between S3 buckets as the transfer occurs over the AWS private network rather than through a VPC or external-to-AWS network.

To the extent that the above does not answer your question, please let us know.

In addition, can you please confirm that Plaintiffs are working to set up an S3 bucket to receive the Currenex/State Street trading data, as we requested weeks ago? We cannot begin to transfer any data to Plaintiffs until this infrastructure is properly in place, which will require Plaintiffs' cooperation and prompt responses to our requests.

Thanks,
Deanna

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From: Tom Lepri <thomaslepri@quinnemanuel.com>

Sent: Wednesday, November 20, 2024 8:22 AM

To: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>

Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>

Subject: Re: State Street Bank data production

Deanna, our IT person has the security question below, relating to the "bucket creation." Can your "IT people" address?

Are these buckets configured with S3 Endpoints? Reason for asking, if both the source and destination S3 buckets are configured as S3 endpoints – this will completely restrict public access or ensure the data remains confined with AWS region.

Thanks,
Tom

From: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>

Date: Monday, November 11, 2024 at 3:59 PM

To: Tom Lepri <thomaslepri@quinnemanuel.com>, Gaioni, Mark <Mark.Gaioni@ropesgray.com>, Jones, Robert <Robert.Jones@ropesgray.com>, Simkin, Alexander <Alexander.Simkin@ropesgray.com>

Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>, Vinay Basti <vinaybasti@quinnemanuel.com>, Timothy Nagle <timothynagle@quinnemanuel.com>, Aaron Zigler <aaron@ziglerlawgroup.com>

Subject: RE: State Street Bank data production

[EXTERNAL EMAIL from deanna.minasi@ropesgray.com]

Tom,

To further the below, we wanted to provide additional information in connection with the AWS transfer logistics. Please see the below.

Currenex Data Transfer to Plaintiffs

- Currenex's role ARN is as follows:
 - [REDACTED]
- As noted in the below email, we will require a bucket in [REDACTED] and the bucket's ARN from Plaintiffs. Please provide this information as soon as it becomes available.

XTX Data Transfer to Currenex/State Street

- Currenex/State Street's ARN of the bucket created in AWS [REDACTED] is as follows:
 - [REDACTED]
- Please note that we will require a bucket and role ARN from Plaintiffs.

Please let us know of any questions.

Thanks,
Deanna

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From: Beck, Deanna (Minasi)

Sent: Friday, November 08, 2024 5:33 PM

To: 'Tom Lepri' <thomaslepri@quinnemanuel.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <robert.jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>

Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti

<vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>

Subject: RE: State Street Bank data production

Tom,

As an initial matter, we reject Plaintiffs' recitation of what you claim we told you regarding the timing of Currenex's trading data production. We did not represent with any degree of certainty that Currenex's data production would be completed by any specific date. Rather, each time we spoke about the data production, we conveyed the current status and our understanding how and when the process would proceed. We have consistently explained that the collection and production of over 200TB of this type structured data is unprecedented, subject to substantial technical complexities, and that those complexities might well impact timing (as has apparently been the case with XTX's much smaller and less complex data collection and production). As we previously expressed to you when we provided a detailed update weeks ago, we have been moving forward as quickly as is practical given the magnitude and complexity of the production, and we share Plaintiffs' desire to complete it promptly.

We also reject Plaintiffs' one-sided narrative as ignoring their own extensive delays in collecting and producing XTX's data. You have represented to us that XTX's volume of data amounts to approximately **20TB**, which is a small fraction of what we have been collecting and will produce. Notwithstanding this drastic difference in burden and complexity, we just learned yesterday—after waiting months for any indication of timing—that XTX does not expect to be in a position to produce any of its data for another two or three weeks. In addition, it took Plaintiffs two weeks to respond to Currenex and State Street's repeated requests for information about the AWS infrastructure being used by Plaintiffs, which is necessary to begin the transfer.

Now that Plaintiffs have responded to our efforts to arrange transfer logistics, we will move forward with our technology professionals to establish the necessary AWS connections and begin the data transfer. To that end, with respect to the AWS options set forth in your below email, our preference is Approach 1. Please create a bucket in [REDACTED] as described in Item 1.2 of your email below, and provide us with the bucket's ARN. We will work with our technology professionals to set this up on our end, and will revert with a role ARN, as well as our own bucket information to facilitate the transfer of XTX's data.

The Currenex and State Street trading data productions and the source code production are being made as expeditiously as possible, and on what appears to be approximately the same timeline that Plaintiffs estimate for XTX's much smaller and less complex production, if not sooner. We, like you, cannot provide a date certain for the transfer to be completed for a number of reasons including that, as your email notes, data transfers of this magnitude will require coordination between your and our respectively technology professionals. To the extent our anticipated production timeline changes, we will let you know. We ask that Plaintiffs do the same with respect to their own data productions. In the meantime, we look forward to receiving your bucket's ARN so that we can proceed with setting up the relevant data transfer.

Thanks,
Deanna

From: Tom Lepri <thomaslepri@quinnemanuel.com>
Sent: Thursday, November 07, 2024 2:12 PM
To: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: RE: State Street Bank data production

Deanna – Thanks for your email. At the bottom of this email, I’m providing a description of our AWS setup and some suggested approaches for the data transfer. Let me know if you have any questions.

We ask that you please accelerate the production of Currenex’s source code. Currenex committed to produce its source code in early July, approximately four months ago. It’s not clear to us why the source code wasn’t produced long ago, much less why its production would take as long as Currenex’s data production. The expert work that will need to be done with the source code is extensive, to say the least. Plaintiffs’ experts need that material as soon as possible so they can start their work well ahead of the class certification deadline, which is steadily approaching (and which we note is approximately four months earlier than the deadline by which Defendants must submit their initial expert reports).

Many, many months ago, when we first discussed the timeline for Currenex’s data production, we were assured that there was no cause to worry, and that the production would be made with plenty of time to spare ahead of the deadline for substantial production. Specifically, we were told that the production would certainly happen before November. Now it’s November and we still don’t have a firm date for the data production. What’s more, it now appears Currenex is planning to produce its source code *and* State Street Bank’s trading data more or less contemporaneously with the Currenex data production, on the eve of the substantial completion deadline, jamming Plaintiffs’ experts with an immense amount of data at the holidays and leaving them with only six or so months to analyze the materials and put together expert reports.

With all that in mind, we ask that you commit to producing Currenex’s source code within ten days. We also ask that you do the same with State Street’s data.

With respect to XTX’s data, we have completed an initial pull but have run into some problems with missing fields. We are working hard to rectify that problem and expect to be in a position to produce the full set of executed trade data within the next two or three weeks.

AWS Infrastructure and Data Transfer Logistics:

Our experts have set up a virtual private cloud (VPC) on AWS in the [REDACTED] region, and are using private S3 buckets to store data productions. They suggest the following approaches for data transfer:

Approach 1: Suitable if Currenex's data resides within AWS

Currenex uploads the production to their own S3 bucket

Plaintiffs create an S3 bucket to receive the production

The transfer is conducted using the AWS DataSync service, using the procedure described here:

https://docs.aws.amazon.com/datasync/latest/userguide/tutorial_s3-s3-cross-account-transfer.html

Approach 2: Suitable if Currenex's data already resides within AWS, or if Currenex has a high-bandwidth connection into AWS

Plaintiffs will create an S3 bucket to receive the production, and provide Currenex with the login details for a dedicated IAM account that has permission to read/write to the bucket

Currenex will upload their production to the bucket. Any method may be used (S3 API, DataSync service, etc).

Currenex will indicate once the upload is complete, and transfer of the user account and bucket will be returned to Plaintiffs

Both approaches likely will require coordination between Currenex's IT staff and Plaintiffs' IT staff.

Thanks,
Tom

From: Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>

Sent: Wednesday, October 30, 2024 6:41 PM

To: Tom Lepri <thomaslepri@quinnemanuel.com>; Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>

Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>

Subject: RE: State Street Bank data production

[EXTERNAL EMAIL from deanna.minasi@ropesgray.com]

Tom,

State Street's trading data is being collected as part of the same data transfer we described in our October 24, 2024 email and we currently anticipate producing State Street's data on approximately the same timeline as Currenex's data. In the meantime, we need information regarding Plaintiffs' infrastructure on AWS so that our experts can work to set up the requisite data transfer logistics.

Our experts believe the best way to facilitate the data transfer is for you to provide us with write-access to Plaintiffs' AWS bucket so we can manage the copy process that transfers data from Defendants' AWS bucket to Plaintiffs'. This arrangement should ensure that the transfer is secure and avoid the potential need for time consuming file-level encryption. If you agree, please provide this information as soon as possible so as to avoid unnecessary delays in transferring the data. If you have an alternate proposal, please let us know promptly for the same reasons.

We again reiterate our request from October 16 and October 24 for an update on the production of GTX's trading data, which we understand to be materially smaller than the amount of data we are working to transfer to you.

Thanks,
Deanna

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From: Tom Lepri <thomaslepri@quinnemanuel.com>
Sent: Wednesday, October 30, 2024 12:47 PM
To: Gaioni, Mark <Mark.Gaioni@ropesgray.com>; Jones, Robert <Robert.Jones@ropesgray.com>; Beck, Deanna (Minasi) <Deanna.Minasi@ropesgray.com>; Musallam, Samer <Samer.Musallam@ropesgray.com>; Simkin, Alexander <Alexander.Simkin@ropesgray.com>
Cc: Jeremy Andersen <jeremyandersen@quinnemanuel.com>; Vinay Basti <vinaybasti@quinnemanuel.com>; Timothy Nagle <timothynagle@quinnemanuel.com>; Aaron Zigler <aaron@ziglerlawgroup.com>
Subject: State Street Bank data production

Counsel — We've been having some back and forth about the timing of Currenex's data production. But we have not yet received any data from State Street Bank. Can you please let us know when you intend to produce it?

Thanks,
Tom

Tom Lepri
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